

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

TECHNOLOGY INNOVATIONS ASSOCIATES LLC, Plaintiff, v. GOOGLE INC., Defendant.	C.A. No. 13-355-LPS JURY TRIAL DEMANDED
---	---

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Technology Innovations Associates LLC (“TIA”) and Defendant Google, Inc. (“Google”) jointly and respectfully move the Court to amend the current Case Scheduling Order (Doc. 58) as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Plaintiff’s Production of an Initial Claim chart relating each known accused product to the asserted claims (Doc. 58 at ¶7(c))	January 9, 2015	February 6, 2015
Invalidity Contentions and prior art production (Doc. 58 at ¶7(d))	February 16, 2015	March 16, 2015
Substantial Completion of Document Production (Doc. 58 at ¶8(b))	April 6, 2015	May 4, 2015
Motion to amend the pleadings to allege inequitable conduct (Doc. 58 at ¶2)	April 6, 2015	May 4, 2015
Exchange Claim Terms for Construction (Doc. 58 at ¶12)	March 5, 2015	April 2, 2015
Submit Joint Claim Construction Chart (Doc. 58 at ¶12)	March 25, 2015	April 23, 2015

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Opening Claim Construction Brief (Doc. 58 at ¶13) and Tutorials (if any) (Doc. 58 at ¶11)	April 5, 2015	May 4, 2015
Responsive Claim Construction Briefs (Doc. 58 at ¶13)	May 6, 2015	June 3, 2015

The requested modifications are sought to promote potential resolution of this matter.

The requested modifications to the schedule will not affect any other deadlines, including the *Markman* hearing date of August 3, 2015, or prejudice any party in any foreseeable manner.

Dated: January 6, 2015

BAYARD, P.A.

/s/ Stephen B. Brauerman

Richard D. Kirk (#922)
Stephen B. Brauerman (#4952)
Bayard, P.A.
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
(302) 655-5000
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com

ATTORNEYS FOR PLAINTIFF
TECHNOLOGY INNOVATIONS
ASSOCIATES, LLC

POTTER ANDERSON & CORROON LLP

/s/ Richard L. Horwitz

Richard L. Horwitz (#2246)
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com
bpalapura@potteranderson.com

ATTORNEYS FOR DEFENDANT
GOOGLE, INC.

IT IS SO ORDERED this ____ day of _____, 2015.

Hon. Leonard P. Stark
Chief United States District Judge